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March 28, 2017

United States District Court
Eastern District of New York
Judge Leonard Wexler
Federal Court House
100 Federal Plaza
Central Islip, New York 11722

Re: Liana Hercules Fernandez v. Karnafully Distribution
Inc., et al.

Case No.: 16 CV 4180

Dear Judge Wexler:

The undersigned represents the Plaintiff, Liana Hercules Fernandez in her lawsuit against Karnafully Distribution Inc., and Mohammed Akbar (collectively the "Defendants"). The parties have engaged in the expedited discovery required by the Court, on FLSA matters. As a result, settlement of the matter has been reached. The parties proposed settlement agreement is attached hereto as Exhibit "A" for Your Honor's approval.

The parties agreed to settle the dispute for a total of twenty eight thousand dollars (\$28,000.) Out of the total nine thousand three hundred and thirty three dollars and thirty three cents (\$9,333.33) represents attorney's fees, cost and expenses. The remaining eighteen thousand six hundred and sixty six dollars and sixty seven cents (\$18,666.67) represents payment to Plaintiff.

Defendants, agreed to compensate Plaintiff for **all** of her alleged overtime hours plus approximately twenty five (25%) in liquidated damages. Defendants' counsel also agreed to pay most of plaintiff's counsel legal fees.

Taking the above into consideration, the parties believe that the settlement amount to be paid is fair and just. In fact,

Defendants believe the amount paid to the Plaintiff covers well more than she is entitled to receive. Given the risks associated with litigation, Plaintiff believes the settlement is fair and reasonable.

Accordingly, we respectfully request that Your Honor approve the proposed Settlement Agreement and order that this matter be closed with prejudice.

Thank you for your courtesies in this matter.

Law Offices of Delvis Melendez P.C.
Attorney for Plaintiff

By _____
S//S Delvis Melendez
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